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11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16 and) Chapter 11
17)
18 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
19 COMPANY)
20 Debtors)
) DECLARATION OF ROBERT	
) BRYSON IN SUPPORT OF MOTION	
21 Affects:) FOR ORDER AUTHORIZING
22 <input type="checkbox"/> PG&E Corporation) WITHDRAWAL OF COUNSEL TO
23 <input type="checkbox"/> Pacific Gas & Electric Company) LUSI NAIVALURUA
24 <input checked="" type="checkbox"/> Both Debtors)
25 * All papers shall be filed in the Lead)
26 Case, No. 19-30088 (DM).)

Declaration of Robert Bryson

I, Robert Bryson, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this declaration.

2. I am an attorney with the law firm of Robins Cloud LP (the “Firm”), attorneys of record for Lusi Naivalurua (“Creditor”).¹ I am duly admitted to practice law before all courts of the State of California and before this court.

3. I make this declaration in support of the Firm's motion to be relieved as counsel to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true and within the scope of my personal knowledge, and if called upon to do so I could and would testify competently to these facts.

4. On January 29, 2019, Debtors filed voluntary petitions commencing their bankruptcy cases.

5. In October 2019, the Firm filed Proof of Claim No. 30568 (“Claim”) on behalf of Creditor. Since filing the Claim, the Firm has been unable to communicate with Creditor. The Firm has attempted to contact Creditor by telephone, email, and letter, all to no avail. Creditor refuses to speak or otherwise communicate with the Firm.

6. The Firm hired a private investigator (“Investigator”) to locate Creditor and facilitate communication between the Firm and Creditor. The Investigator failed to locate Creditor.

7. The logical inference is that an irreconcilable breakdown in the attorney-client relationship has developed and Creditor no longer desires to be represented by the Firm.

8. To the extent that Creditor requests that the Firm turn over any files or information that he is entitled to, the Firm will cooperate and transmit such files.

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¹ The Firm retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

9. The Firm will cause the Motion to be served on all of the addresses provided to the Firm by Creditor or procured by the Investigator during his attempts to locate Creditor, including the following:

2114 Wedgewood Way, Santa Rosa, CA 95404

9910 Bernborough Lane, Reno, NV 89521

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 5, 2021.


Robert Bryson